Reply-To: William Hamilton - QQC <william.hamilton@gsa gov> Message-ID: <00000000000006c05bb05e16d2b4a@google.com>

Date: Tue, 14 Jun 2022 19:11:19 +0000

Subject: Document shared with you "DRAFT MBL Technologies Formal CAP Notice 061422"

From: "William Hamilton - QQC (via Google Docs)" <drive-shares-dm-noreply@google.com>

To: laurie.southerton@gsa.gov Cc: brian conrad@gsa.gov, evan isaacs@gsa.gov X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0

X-Email-Hash-MD5: 5a3de445b01f839224dad0d140d95e41

william.hamilton@gsa.gov shared a document



william.hamilton@gsa.gov has invited you to edit the following document:

Hi Brian - Here is a final draft of the MBL Technologies formal CAP notice regarding their poor assessment for Issio. As discussed earlier, MBL used unqualified personnel and provided incomplete / inaccurate assessment deliverables. If you need any o her info, just let me know.

Thanks -

John

■ DRAFT_MBL Technologies Formal CAP Notice_061422



Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
You have received this email because william.hamilton@gsa.gov shared a document with you from Google
Google Workspace Docs.

Date: Wed, 15 Jun 2022 13 37:57 -0700

Reply-to: Reply <d+AORGpRcj-F1aSrvXHSZXb47Ct81lAbjMoiLdHuaXNn6FBEMea3iSzrxnGV11EUhVWvbmL3MReW6alnfq4UijADx-FxhUYWW2DiesmkWckBdbzwuE38FJGJgV1kBGsgFUD4-sekt27tP@docs google.com>

Message-ID: <Wufrldyfiw NLGQKQGtJdQ@notifications google.com>

Subject: MBL Technologies ... - @laurie.southerton@gsa.gov is that wh...

From: "Jennifer Carlson - QQC-C (Google Docs)" <comments-noreply@docs.google com>

To: laurie.southerton@gsa.gov

X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0

X-Email-Hash-MD5: 5d90f63189a79c76dff2a89dda949213

MBL Technologies In Remediation 15JUN2022

1 comment

certifier,

Jennifer Carlson - QQC-C • 4:32 PM, Jun 15 (EDT) New
@laurie.southerton@gsa.gov is that what we call them?

Assigned to you

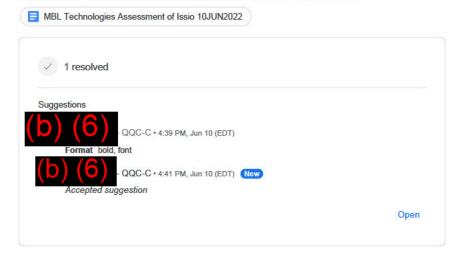
Open

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Evan Isaacs - QQC-C accepted a suggestion in the following document



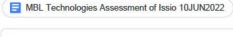
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

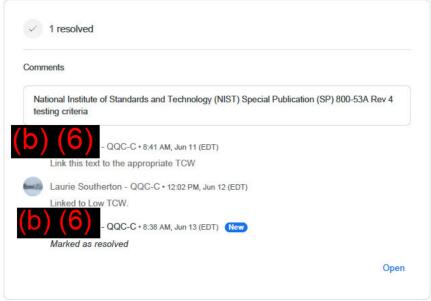
You have received this email because you are subscribed to all discussions on MBL Technologies
Assessment of Issio 10JUN2022. Change what Google Docs sends you. You can reply to this email to reply to the discussion.



Date: Mon, 13 Jun 2022 05:43:42 -0700 Reply-to: Reply <u+AORGpRdL6EGyw-FCOAVnk9Szd4o9KyoQSTPSfVOTC8yrkgyTpcKVDGwJ3sRqmOBaP7o-iRTMjajvOmZYOTySsQZOwjPVJbBNXQAlb5g99SMRrVkmplMSY5rDwPiCy5fYPJjeiDqkjcf@docs google comp Message-ID: <MBdNA4xzcg4Vlg-kOvliLw@notifications google.com> Subject: MBL Technologies ... - Link this text to the appropriate TCW From: "(b) (6) - QQC-C (Google Docs)" <comments-noreply@docs.google com> To: laurie.southerton@gsa gov X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: aa54c33e78d4e9e67434027ba486519d

Evan Isaacs - QQC-C resolved a comment in the following document





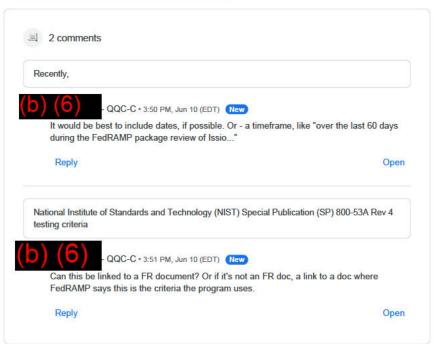
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

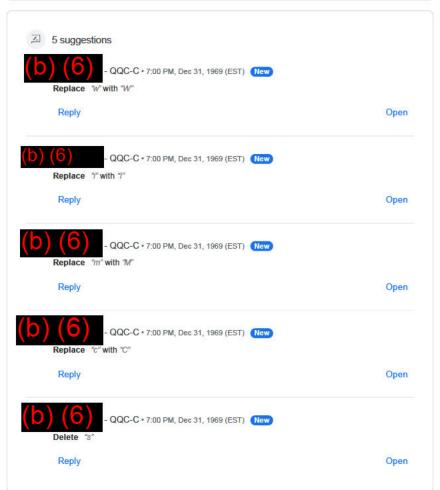
You have received this email because you are a participant in this thread. Change what Google Docs sends you. You can reply to this email to reply to the discussion.



New activity in the following document







Date: Fri, 10 Jun 2022 13:19 08 -0700

Reply-to: No Reply <d+noreply@docs.google.com>

Message-ID: <-Uju7rTy4-pot5ch7LflyA@notifications.google com>

Subject: MBL Technologies Assessment of Issio 10,JUN2022

From: "[0] [6] — QQC-C (Google Docs)" <comments-noreply@docs.google com>
To: laurie.southerton@gsa.gov

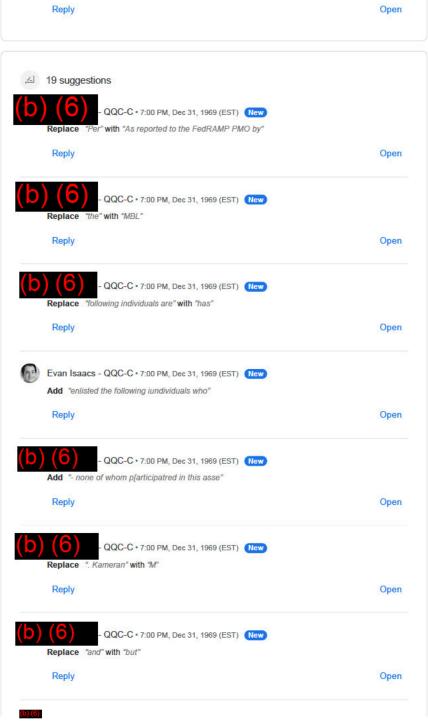
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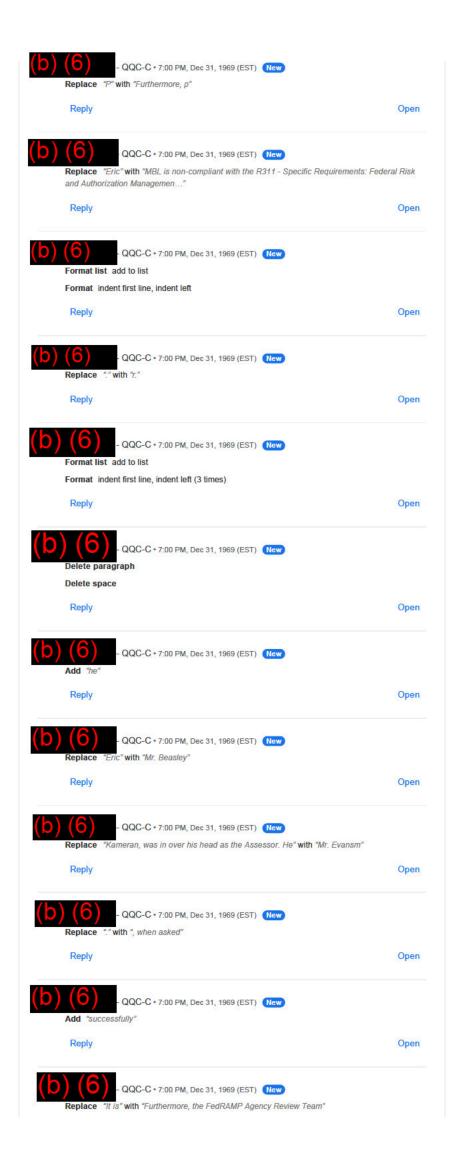
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New activity in the following document

■ MBL Technologies Assessment of Issio 10JUN2022







Reply

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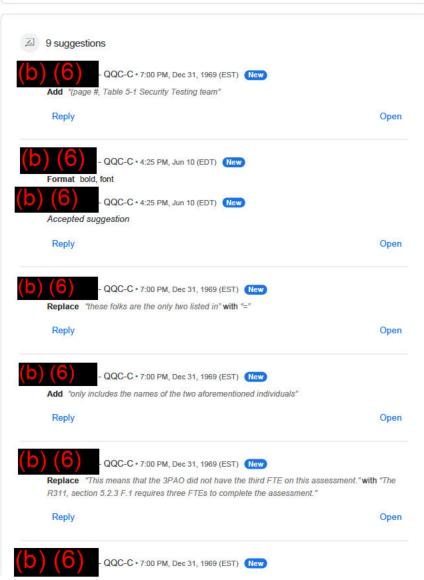
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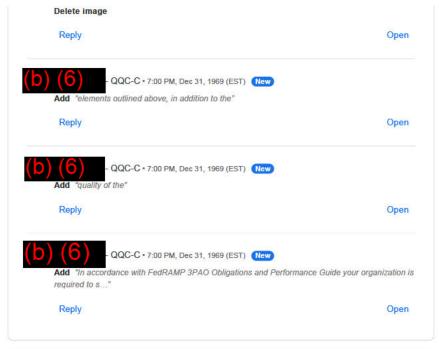
Google

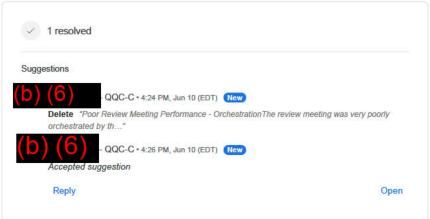
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■ MBL Technologies Assessment of Issio 10JUN2022









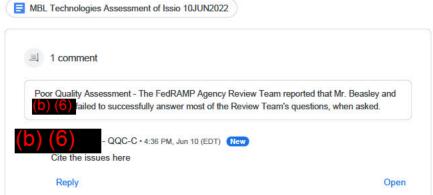
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

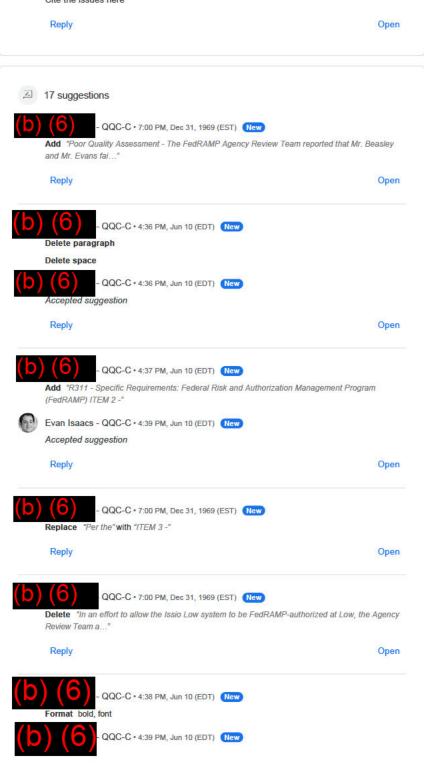
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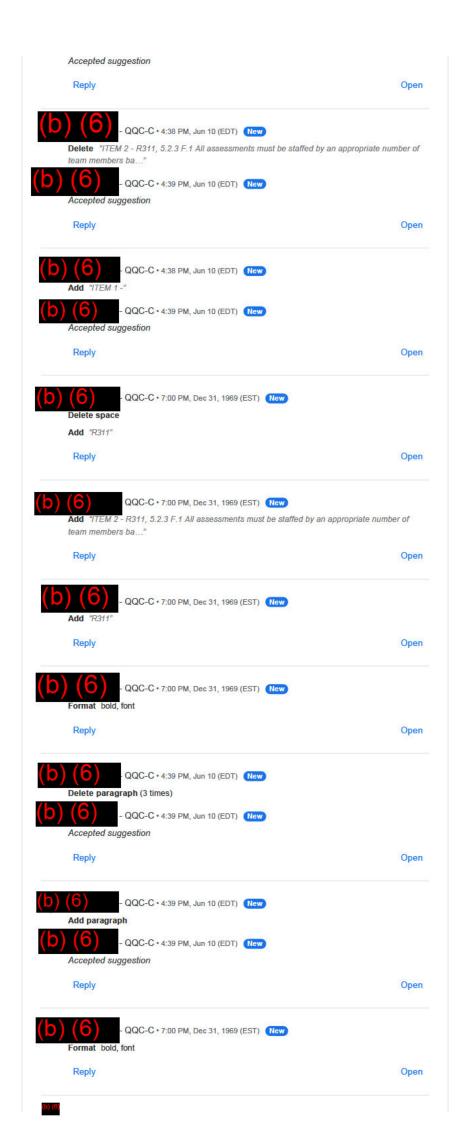




New activity in the following document











Date: Sat, 11 Jun 2022 05:48:32 -0700

Reply-to: No Reply <d+noreply@docs.google.com>

Message-ID: <cmysWNalpl9_sylwPt8rg@notifications.google com>
Subject: MBL Technologies Assessment of Issio 10JUN2022

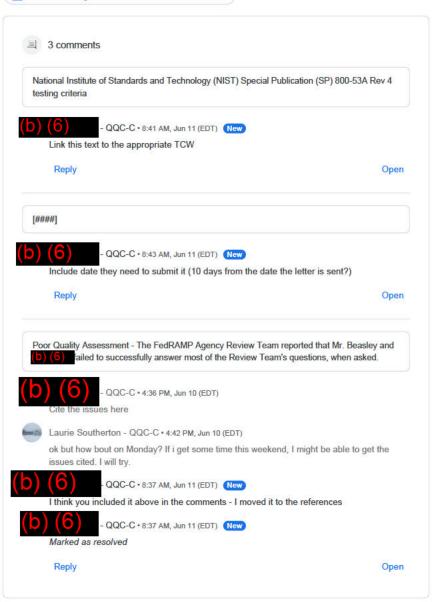
From: -(b) (6) _____ QQC-C (Google Docs)" <comments-noreply@docs.google com>
To: laurie.southerton@gsa.gov

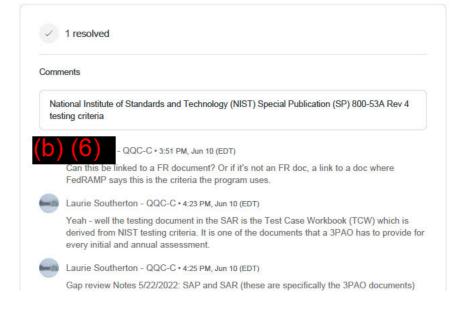
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0

X-Email-Hash-MD5: f50c2494ada32501f960771668d2816f

New activity in the following document

■ MBL Technologies Assessment of Issio 10JUN2022





SAP - Several noted discrepancies concerning SAP that were not addressed relating to removing sections from SAP, rules of engagement portions missing, sampling methodology missing. 3PAO note findings in Final review report and incorporate actions in future assessments.

SAR - Problems with SAR noted:

Risk Exposure Table (RET) -

Source of Discovery Column incorrectly filled out - 3PAO should follow guidance in RET table and fill out correctly in all future Assessments

Name column should adequately note the name of the vulnerability for easy tracking; for example, the name specified in the vulnerability scan tool and include the Plug-in ID The description for vulnerability scan findings should note the description provided by the scan tool used.

SAR Section 6, RIsks Known for Interconnected Systems - Does not adequately capture all external services. It should catalog all external services, not just those that are FedRAMP authorized, but also those that provide updates as well as services lacking FedRAMP authorization. In the next AA for this Service and all future assessments, 3PAO should capture ALL interconnections.

Test Case O&Es - As noted in concerns addressed regarding critical controls, several of the O&Es in the test cases in adequately describe what and how the 3PAO determined findings status. There will be additional comments in review report that 3PAO should heed. Scans - No raw scans provided with SAR. In future, 3PAO MUST provide all RAW scans! Risk documentation - The Risks are inconsistently identified in the SAR. Final review report will note. The 3PAO is expected to QA its work for accuracy, completeness, and consistency before submitting to customer/agency/PMO



- QQC-C • 8:40 AM, Jun 11 (EDT) New



Marked as resolved

Reply Open

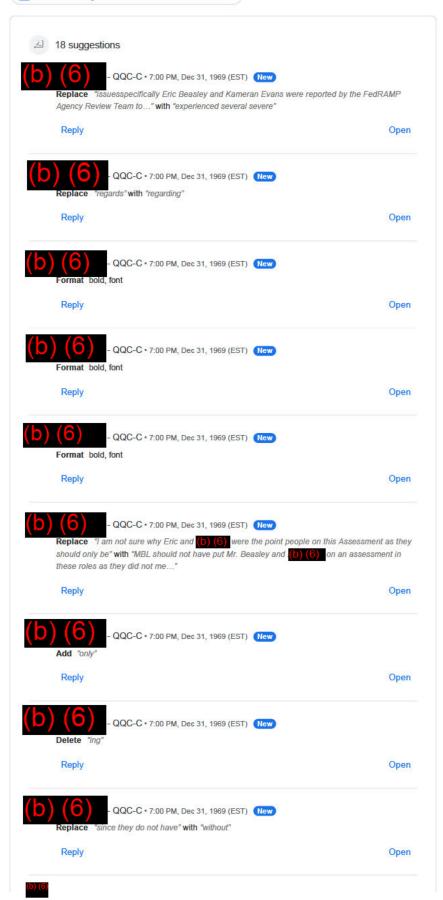
Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

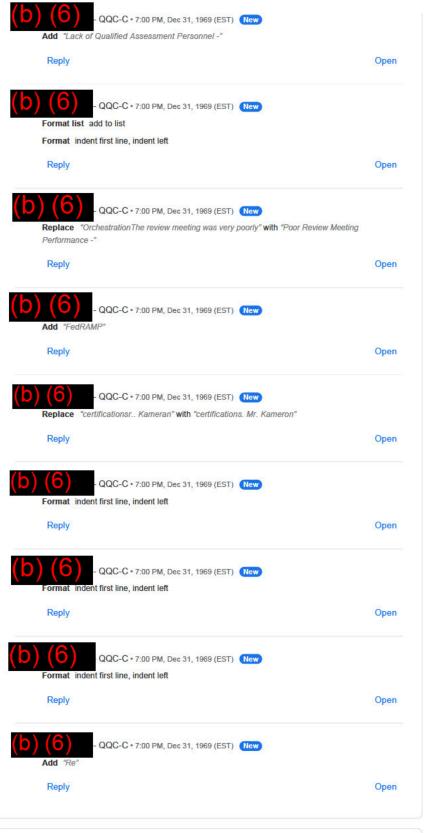
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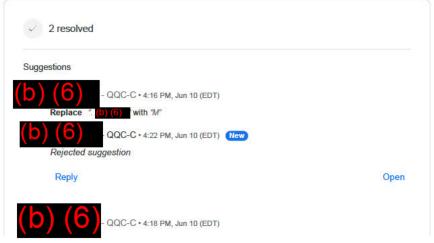
Google

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Date: Wed, 15 Jun 2022 14 03:03 -0700

Reply-to: No Reply <d+noreply@docs.google.com>

Message-ID: <fUDgrud05vJHkil.zEH8c9Q@notifications google com>

Subject: MBL Technologies In Remediation 15JUN2022

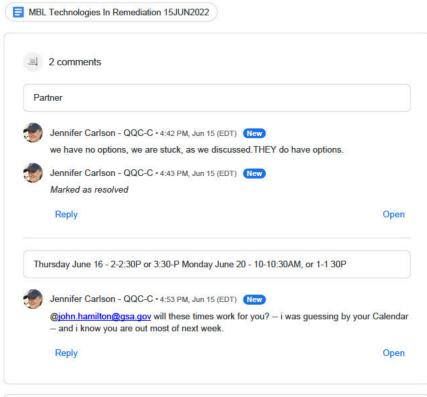
From: "Jennifer Carlson - QQC-C (Google Docs)" <comments-noreply@docs.google com>

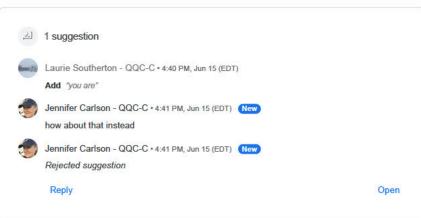
To: laurie.southerton@gsa gov

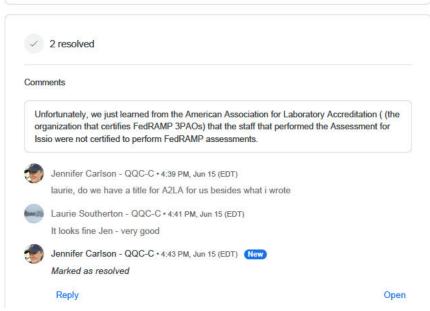
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0

X-Email-Hash-MD5: 31c38637b8d6335f5ac1e283b5657e7f

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You have received this email because you are a participant in the updated discussion threads. Change what Google Docs sends you. You cannot reply to this email.



From: John Hamilton <william.ham Date: Wed, 15 Jun 2022 16 59:06 -0400 Message-ID: <CADR9bRrk+HoZicRGBbFKUOPzt+LLTipndzzs1C6Vg+fg2AOfcA@mail.gmail.com> Subject: Re [External] Action Needed MBL Technologies Formal Complaint Notice To (b) (6) mbltechnologies.com>

Cc: FedRAMP <= FedRAMP@mbltechnologies.com>, Brian Conrad - QQC <= brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <= carrie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <= carrie.Southerton@gsa.gov>, ashley Kamauf (b) (b) @a2la.org>, Bibi Abdullah <= carrie.Southerton@gsa.gov>, info@fedramp.gov>, (b) (6) mbltechnologies.com> X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0 X-Email-Hash-MD5: 3309a76736e0facb44ee867dfc5e556b @Jenny and Laurie - Can you direct [D) (6) to the latest version of the SAR the team reviewed in MAX Thanks all -John On Wed, Jun 15, 2022 at 4:44 PM(b) (6) mbltechnologies com> wrote: Thanks, John Please send the version you are working with Many thanks, From: John Hamilton < william hamilton@gsa gov> Sent: Wednesday, June 15, 2022 4:43 PM Yes, there was a transition timeline of 6 months for organizations to become compliant if they didn't currently have staff onboard that were qualified to perform FedRAMP assessments But in this case, the assessors that were utilized were not in compliance with either the old version of the R311 or the newly released version Regards -John On Wed, Jun 15, 2022 at 4:35 PM (b) (6) (b) (6) (b) (6) mbltechnologies com> wrote: John Thank you for your prompt response We do understand and are prepared to develop a CAP but we also want to insure we are all on the same page with regard to the new personnel requirements A2LA gave 3PAOs a 6 month transition time period to allow personnel to become compliant. This ended January 1,2022. I have attached the memo from A2LA which confirms this We would like clarification on this issue as we believe this drives a portion of our CAP response Regards, (b) (6) From: John Hamilton < william hamilton@gsa gov> Sent: Wednesday, June 15, 2022 4:08 PM To: | (b) (6) (6) | mbltechnologies com>

Cc: FedRAMP < | FedRAMP@mbltechnologies com>

Brian Conrad - QQC < | brian conrad@gsa gov>

Laurie Southerton - QQC-C < | Laurie Southerton | La Jennifer Carlson - QQC-C < jennifer carlson@gsa.gov >, Ashley Kamauf < (b) (6) @a2la org >, Bibi Abdullah < (b) (6) @a2la org >, info fedramp < (b) (6)

According to A2LA's records, Eric Beasley and Kameran Evans also did not meet the certification requirements for the previous version of the

R311 when the SAR was first created in 2020. The last Issio SAR reviewed by the PMO was dated 9/13/21, which means the current version of the R311 (released on 6/29/21) was in place. Fur her, MBL performed post-SAR assessment activities that were documented in undated attestation statements posted by Eric Beasley to the MAX repository on 5/6/20 and 6/9/22.

As initially requested, we're looking for a remediation plan related to these concerns within 10 business days of this notice.

Thank you -John

On Wed, Jun 15, 2022 at 2:47 PM (b) (6) (6) (6) (6) mbltechnologies com> wrote:

Good afternoon

This has been received Before we respond, I would like to confirm that this is referencing the SAR that was sent to the PMO November 12, 2020? If so, this was performed well before the A2LA Personnel requirements change which were announced in the updated R311 dated October 12, 2021

We would like to set up a call to discuss this We are concerned we are being penalized because the PMO is upholding current standards to an assessment that was performed in 2020 Please advise us of your schedule

Regards,



From: John Hamilton < william hamilton@gsa gov >

Sent: Wednesday, June 15, 2022 2:16 PM

To: (b) (6) (b) (6) (b) (6) (b) (6) (c) mbltechnologies com>; FedRAMP < FedRAMP@mbltechnologies com>

Cc: Brian Conrad - QQC <bri>brian conrad@gsa gov>; Ashley Kamauf
(b) (6) @a2la org>; Bibi Abdullah
(b) (6) @a2la org>; info fedramp

< info@fedramp gov>

Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice



After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO identified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in the <u>A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program (FedRAMP)</u>. Please see the enclosed letter for more information related to these concerns.

Based on the severity of the issues noted above and, in accordance with FedRAMP's 3PAO Obligations and Performance Standards, your FedRAMP recognition status is now "In-Remediation" and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed with your quality system. Within 10 business days of this notifica ion, a written formal corrective action plan (CAP) response must be provided both he FedRAMP PMO and A2LA (via info@fedramp.gov and fedramp.@a2la.org) hat identifies the root cause, how and when the deficiencies will be remediated, and actions that will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to he submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization's FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolu ion may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don't hesitate to reach out if you have any further questions.

Thank You -

--

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transforma ion Service | GSA



william.hamilton@gsa.gov

--

John Hamilton

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FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

| william.hamilton@gsa.gov

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John Hamilton

Technology Transformation Service | GSA

(b) (6)

| william.hamilton@gsa.gov

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John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

| william.hamilton@gsa.gov

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John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

| william.hamilton@gsa.gov
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To: John Hamilton
To: John Hamilton william.hamilton@gsa.gov">william.hamilton@gsa.gov
CC: FedRAMP FedRAMP@mbltechnologies.com">william.hamilton@gsa.gov
, Brian Conrad - QQC brian.conrad@gsa.gov
, Laurie Southerton - QQC-C alaurie.Southerton@gsa.gov
, Jennifer Carlson - QQC-C alaurie.Southerton@gsa.gov
, Ashley Kamauf alaurie.Southerton@gsa.gov
, info@fedramp.gov
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Ashley Kamauf alaurie.Southerton@gsa.gov
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Ashley Kamauf alaurie.Southerton@gsa.gov
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Ashley Kamauf alaurie.Southertongsa.gov

Ashley Kamauf alaurie.Southerton.gov

Ashley Kamauf alaurie.Southertongsa.gov

Ashley Kamauf alaurie.Southe Subject: RE [External] Re [External] Action Needed MBL Technologies Formal Complaint Notice Date: Wed. 15 Jun 2022 22:59:08 +0000 Message-ID: <DS0PR19MB64798BBEF270A4104DE22FCBF8AD9@DS0PR19MB6479.namprd19 prod.outlook com> X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov 0 X-Email-Hash-MD5: 0c7a7e512681f708745297da9ee0a822 Thank you, John. Have a great evening. From: John Hamilton <william.hamilton@gsa.gov> Carlson - QQC-C < jennifer carlson@gsa gov>; Ashley Kamauf < (b) (6) @a2la org>; Bibi Abdullah < (b) (6) @a2la.org>; info fedramp <info@fedramp.gov>; (b) (6) mbltechnologies.com> Subject: [External] Re: [External] Action Needed: MBL Technologies Formal Complaint Notice oro - Thanks for letting us know the areas of confusion; please see the attached, revised CAP letter that clarifies your initial questions around the personnel equirements and what version of the R311 MBL was not in compliance with during the time first SAR was developed. I've also attached the previous version of the R311, dated 12/20/19, for your reference. If you have any additional questions, please let me know. Thank You -John On Wed, Jun 15, 2022 at 5 08 PM(b) (6) (6) (6) mbltechnologies.com> wrote: Thanks John. Really appreciate you help. We are trying to understand which version of the R311 you are referring to when you say our assessors were not in compliance with either the old version of the R311 or new version. We are a bit confused as the complaint letter indicates our assessors did not have the "required certifications", however the R311 that we are looking at that was in place back in 2020 did not have certification requirements. The June 2021 R311 introduced them and gave 3PAOs a transition period until January 1, 2022. Sorry to be a pain, we e are struggling with the rationale behind this complaint. Happy to have a call to discuss. From: John Hamilton < william.hamilton@gsa.gov> Sent: Wednesday, June 15, 2022 4:59 PM To: | Carlson - QQC-C <<u>jennifer.carlson@gsa.gov</u>>; Ashley Kamauf (b) (6) @a2la org>; Bibi Abdullah (b) (6) @a2la.org>; info fedramp <<u>info@fedramp.gov</u>>; (b) (6) @bltechnologies.com> (b) (6) mbltechnologies.com>
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Regards,

From: John Hamilton < william.hamilton@gsa.gov>

Sent: Wednesday, June 15, 2022 2:16 PM

Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice

After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO iden ified several fundamental testing accuracy and completeness issues associated with he assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in he A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program (FedRAMP). Please see the enclosed letter for more information related to these concerns.

Based on the severity of the issues noted above and, in accordance with FedRAMP's 3PAO Obligations and Performance Standards, your FedRAMP recognition status is now "In-Remediation" and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed wi h your quality system. Within 10 business days of this notification, a written formal corrective action plan (CAP) response must be provided both the FedRAMP PMO and A2LA (via info@fedramp.gov and fedramp@a2la.org) that identifies the root cause, how and when the deficiencies will be remediated, and actions that will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to the submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization's FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolution may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don't hesitate to reach out if you have any fur her questions.

Thank You -

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

william hamilton@gsa.gov

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

william.hamilton@gsa.gov

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

william.hamilton@gsa.gov

Thank you!

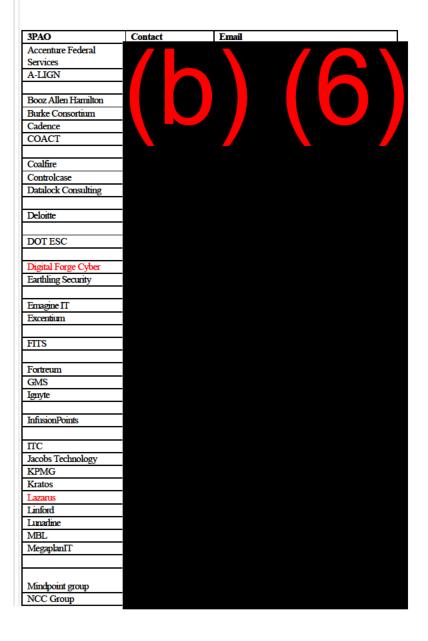
On Thu, Jun 9, 2022 at 12:22 PM Laurie Southerton - QQC-C QQC-C <a href=

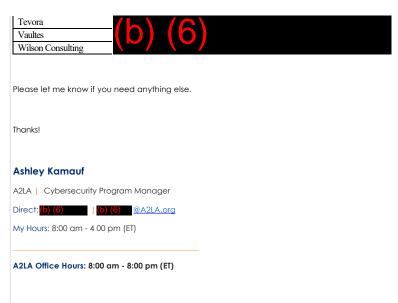
Best -John

On Fri, Jun 3, 2022 at 9:54 AM Ashley Kamauf < (b) (6) @a2la org > wrote:

Hey all

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions – Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.





5202 Presidents Court, Suite 220 Frederick, MD 21703 Main Line: 301 644 3248 www A2LA org



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John Hamilton FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
| william.hamilton@gsa gov

Date: Fri, 10 Jun 2022 16:50:47 -0400 Message-ID: <CAH6vP019=dBtW_mGd1d+W404dZdJkKD+LGs2AkooA6xorzDecA@mail.gmail.com> Subject: Re Document shared with you "MBL Technologies Assessment of Issio 10JUN2022" From: Laurie Southerton - QQC-C <laurie southerton@gsa.gov> To: (b) (6) QQC-C < (b) (6) Qgsa.gov>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0 X-Email-Hash-MD5: 1386b75c32a2caf6c08ebb1d959fad66

Nope! You did grifficat! I just followed along after you to save some time! That is how we have to do things in the Agency review and RAR lanes. It works

I will attempt to carve out some time tomorrow to cite the issues we need. That way on Monday, it will be good to go for your final spin-through

Thank you so very much (b) (6)

On Fri, Jun 10, 2022 at 4:45 PM Evan Isaacs - QQC-C < (b) (6) @gsa gov > wrote:

I made a mess of the doc! I see you going through it now Til take a look again on Monday and clean it up - I did track changes so you could see everything

On Fri, Jun 10, 2022 at 1:02 PM (b) (6) QQC-C < (b) (6) Qgsa gov wrote:

Thanks - I will be able to take a look at it at the end of the day and will add any comments. Have a great weekend!

On Fri, Jun 10, 2022 at 12:51 PM Laurie Southerton - QQC-C (via Google Docs) < drive-shares-dm-noreply@google com > wrote:



Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA You have received this email because laurie.southerton@gsa.gov shared a document with you from Google Workspace



U.S. General Services Administration

(b) (6)

Technology Transformation Services Program Management Office, FedRAMP



U.S. General Services Administration

Technology Transformation Services Program Management Office, FedRAMP



Laurie Southerton FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA m: (b) (6)
e: Laurie.Southerton@gsa.gov

```
Date: Fri. 10 Jun 2022 17:03 54 -0400
      Message-ID: <CAH6vP01+BmiuWaE3TBzMCgv WNXSYCJgNs56mA+vULVXzKvc8g@mail.gmail.com>
          Subject: Re End to End Notes for Review Meeting 6-15-22
            From: Laurie Southerton - QQC-C < laurie southerton@gsa.gov>
                To: Jennifer Carlson - QQC-C <jennifer carlson@gsa.gov>
               X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: c5d345b0d54e4d941b415a6325c64469
Hi Jen,
I have included John and (b) (6) on this thread
will use Evan's revised and finessed MBL letter as a template ( )
Laurie
On Fri, Jun 10, 2022 at 1:31 PM Jennifer Carlson - QQC-C < jennifer carlson@gsa gov> wrote:
 Super bizarre question - I am not understanding - Linford and CO is 3PAO, yet THEY hired (as sub, i take it) Cadence as pen tester? They are fully responsible for
 the Pen Test - if they cannot get their sub in to address issues, its on them to get it fixed/re-done - whatever they need to do (and they should not charge CSP extra for
 the effort)
 On Fri, Jun 10, 2022 at 9:47 AM(b) (6) @linfordco com> wrote:
  Hi(b) (6)
  It was really to talk through a situation
                                                                                                                  Thanks
  Kind regards,
  On Fri, Jun 10, 2022 at 6:57 AM(b) (6) - QQC-C(b) (6) @gsa gov> wrote:
    Good morning(b)(6),
    Can you please give us some specific questions you need? We may be able to get away without a meeting and save some time:)
   Yours Truly.
   (b) (6) Ostergaard, JD
FedRAMP PMO Support (Noblis)
FedRAMP | ITS | GSA
            -- Forwarded message -
    From: (b) (6) @linfordco com>
    Date: Thu, Jun 9, 2022 at 3:35 PM
    Subject: Re: End to End Notes for Review Meeting 6-15-22
                      - QQC-C <(b) (6)
    Hi(b) (6)
   (b) (4)
                                                                     Is there a time on Monday (or Tuesday) that works for you? Thanks
    Kind regards.
    Comments from PMO:
    On Wed, May 25, 2022 at 10:23 AM(b) (6) - QQC-C < (b) (6) @gsa gov > wrote:
     Good afternoon End to End Team.
    We're looking forward to meeting with you. Please find the attached draft review report in response to your submitted system package, and detailed instructions for conducting remediation and the review meeting. These instructions are designed and time-tested to shorten your timeline to Authorization.
     This report provides a level of detail that is intended to be helpful in your remediation efforts for FedRAMP Authorization. At the end of the meeting, we will prioritize follow-on actions, in particular those requiring technical remediation prior to FedRAMP Authorization.
```

The dominant part of the conversation will revolve around:

- 1. Where federal data resides in the system -- that is, not just purposefully in the boundary, but also in corporate and external systems.
- 2. Encryption of flows, internal, external, and in storage. Please be prepared to tell us where there is not encryption on federal data in the system.

To help make the rest of this Authorization process as efficient as possible, we have attached both a PDF and an excel version of the Draft Review Report.

- The PDF is for posterity, so anyone in the future can come back to this point in time.
 The excel is to track each party's questions, comments, and actions taken to address each item, in the pre-labelled columns.
- 3. Please upload this commented-on version to MAX a day or 2 ahead of the Review Mtg (the main folder with the Initial Checklist is good).

We will use your updated version of the report as the presentation and agenda in the Review Meeting.

- End to End will present to the group; choose who will present beforehand.
 The presenter is encouraged to acquaint themselves with Google Meet, and join the meeting early to test it out. I will be online ~10 minutes before the meeting starts.
- 3. We will start in Section B and work line-by-line all the way through to the POA&M in Section G.
- The last topic we will cover in the Review Mtg is logistics/next steps/timelines
 PMO will follow-up after the Review Mtg with:
- - a. Notes from the meeting. These will, just like today, be both in PDF and excel form. CSP/3PAO will again be expected to annotate their actions taken in remediation in the excel sheet.
 - b. A list of next steps and logistics.

Time-saving best practices we have found are:

- 1. Start making updates now. The more actions addressed from the report now, the shorter the overall timeline to Authorization will be
- 2. Please keep track changes on your SSP as you're updating -- we will want to see all the updates you make to the version you gave us for our initial review.

In context of where we are now in the Authorization process:

- Full Package Submission
- Initial Review Phase
- Conduct Review Mtg: PMO, CSP, 3PAO, and Agency meet to answer questions and address concerns found in the Initial Review. \leftarrow End to End is currently at
- Remediation Phase: CSP/3PAO make required updates. When complete reupload to MAX and alert PMO
 Gap Review Phase: PMO usually takes ~10 days to complete and reach out for a Gap Review Mtg or send the Congratulations Email
- The Congratulations email will come from PMO Leadership and contain 2 forms, a survey, and a request to check Marketplace service description.
 When those are returned, the Marketplace designation will be changed to FedRAMP Authorized!

Thank you, and we'll talk to you soon!

Yours Truly,

FedRAMP PMO Support (FedRAMP | TTS | GSA



Jennifer Carlson

FedRAMP PMO Support (Noblis)

FedRAMP | TTS | GSA

m (b) (6)
e: jennifer.carlson@gsa gov



Laurie Southerton

FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA

Date: Wed, 15 Jun 2022 12 06:26 -0400

Message-ID: <CAH6vP0032eytoRdvefXe5HtJycxuMBPUUiiZ6dR=_PTVcBEqFw@mail gmail.com>
Subject: re Issio and MBL Technologies

From: Laurie Southerton - QQC-C <laurie southerton@gsa.gov>

To: William Hamilton - QQC <john.hamilton@gsa.gov>
X-Source-Folder: GSA-2022-001178--laurie.southerton@gsa.gov_0

X-Email-Hash-MD5: 9d5a8abaf4040f0d6e0b66adc64d03f2

Iohn

I know Jen finished the review but even for a Low package that thing was bad

We need to turn them away and tell them to come back when the AGency and the 3PAO can attest that all the work was done The CSP does not get FedRAMP Authorized until that attestation by the Agency and the 3PAO shows up

Laurie

--



Laurie Southerton
FedRAMP PMO Support (Noblis)
FedRAMP | ITS | GSA
m: 0) (6)
e: Laurie.Southerton@gsa.gov

```
From: Jennifer Carlson - QQC-C <jennifer carlson@gsa.gov
                                                   Date: Wed 15 Jun 2022 16 08:05 -0400
                         Message-ID: <CADu0P4vrPvB9HnE0E8WKxrt3=+Cbii6Dz5BY-S6PRzFgrd0ZCQ@mail.gmail.com>
                                          Subject: Re Issio Information System - Recommending FedRAMP Authorization
                                                                To: John Hamilton <william.hamilton@gsa gov>
                                                             Cc: William Hamilton QQC <john.hamilton@gsa.gov>, Brian Conrad - QQC <br/>
| QQC-Q + | QQC | QQC
                                                                             QQC-C <
                                                                                                                                                   - QQC-C <(b) (
           X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: fc90148d1771f8b4328c4f86b5182fcb
```

Hi John, As discussed, I certainly agree with the concern — lack of certification is a game changer. I will draft up a suggested email to engage the Agency for a meeting to discuss their options SInce I had just talked with VA on Monday about the 3PAO concerns, they may not be too surprised

On Wed, Jun 15, 2022 at 2:34 PM John Hamilton < william hamilton@gsa gov > wrote:

Brian and Jenny - I think we need to hold back on approving this package given the severity of the issues we've come across with Issio's 3PAO - MBL Technologies

I don't think it sets a good precedent approving this package when the 3PAO used unqualified personnel and also provided a SAR that doesn't come close to meeting our completeness and accuracy standards

I included you both on the formal CAP response notice that I sent to MBL earlier this afternoon for your awareness. I think MBL needs to first provide a response that we can sign off on and subsequently address the SAR concern areas we noted using staff that are qualified

Let me know if you agree and/or would like to discuss further in a meeting tomorrow

On Wed, Jun 15, 2022 at 11:45 AM Jennifer Carlson - QQC-C < jennifer carlson@gsa gov > wrote:

Good Morning, John - The Team is recommending Issio Information System, a Low baseline service, for FedRAMP Au horization. After about ~9 months in remediation, he CSP made progress on some of the (many) actions noted in our initial review report, though the 3PAO (MBL Technologies) struggled to address their actions, as you are aware of per conversations with Laurie/me, and that you will see documented in the Review Report. Key service concerns involve the need for an AA as soon as possible, external service use, subnet implementation to separate the web server from other CSO components, full DNSSEC compliance (they have par ially implemented), and a number of documentation clarity concerns.

We met with the VA privately and discussed concerns about the 3PAO and the necessity for an AA - due to both the aged testing as well as 3PAO concerns. They agreed to make this a priority and would be following up with the CSP at their next monthly ConMon meeting to discuss he Review Report actions and 3PAO concerns. I did advise VA that the PMO is addressing 3PAO issues directly with the 3PAO separately.

Please see the below and linked, advise of any questions/concerns, or recommend for Brian's Approval.

Best. Jenny

Agency Review Report PDF: (b) (6 Agency Review Report GoogleSheet:

Agency Review Report Executive Summary Notes:

While the Issio SAR indicates that the system has acceptable residual risk, the CSP is still working to remediate some technical and documentation issues, as noted in the POA&M and discussed with the FedRAMP PMO Key findings are noted in this Executive Summary Sections B-G of this report provide details and other items that must be addressed by the CSP by the time frames specified Partnering Agencies must provide governance and oversight of CSP efforts in addressing CSP actions specified in this Review Report as well as for continuous monitoring (ConMon) activities. Please note that the FedRAMP PMO performs spot checks of security packages; failure to maintain monthly continuous monitoring (ConMon) and to address concerns, within this report and the time frames specified, may result in further escalation.

ering agency's risk-accepted key items of note, below CSP actions for each of these key areas are also specified in Secti

- 1 Annual Assessment (see Section B, Other Comments and Section F #12, below): The last full/initial assessment of this Service was conducted in October 2020 and per the Agency ATO date for the service (5-6-21), the Service requires an Annual Assessment at the earliest practical date. Additionally, there are several controls that require re-assessment (See Section D, below). The Agency Partner agreed to engage the CSP concerning conduct of the Annual Assessment.
- 2 External Services Lacking FedRAMP Authorization (see Section C #10, below): Per the security package, this system uses FedRAMP-Authorized cloud services and several other external third party services lacking FedRAMP Authorization, as specified in C#10, below Agencies considering leveraging this security package should review these services and associated data-types to determine if they are acceptable for each agency use case
- 3 Subnetwork Implementation (See Section C, SC-7, below): The publicly accessible web server appears to be in the same subnet as other Issio System components; the CSP is requested to add a POA&M to separate the web server from the other Issio components, in particular, the database server
- 4 DNSSEC Implementation (See Section C, #15, below): The CSP appears to have DNSSEC in place for authoritative DNS, however it is unclear if DNSSEC requests are made when resolving as outside the boundary The CSP is requested to clarify
- domains outside the boundary The CSF is requested to carriy

 5 Authorization Package Clarity Documentation-Only Issues: Several portions of the package require clarification for agency audience understanding The FedRAMP PMO has discussed these concerns with the CSP and they agreed to address them Key concern areas include:

 a The Authorization Boundary Diagram (ABD) and Data Flow Diagrams (DFDs) address the complexity of the CSO; however, they require clarification for improved detail (see Section C#8a)
- and #9, below)
- ritions and leveraged FedRAMP Authorized services require minor clarification in associated SSP Tables (i e , Table 11-1, Table 13-1, Table 8-3, etc) (see Section C #11a and 12,
- c Some SSP controls do not clearly address how the system meets the FedRAMP security control requirements (see Section D, below) d The POA&M is inconsistent with FedRAMP guidance (see Section G, below)

Agencies considering leveraging this security package should engage the CSP for any questions concerning the authorization package, and in particular, the above

Agencies, please ensure that you review and implement the associated customer responsibilities outlined in the SSP and CIS Agency implementation of these responsibilities is critical All agencies leveraging this CSO are required to review monthly continuous monitoring materials provided by the CSP to ensure the risk-posture remains acceptable to each agency customer, based on their risk tolerance and use-case of the system

Significant changes to the CSO should be recorded in the FedRAMP Significant Change Form (located on FedRAMP gov/Templates under Continuous Monitoring Phase) or via a similar form, as directed by the authorizing agency The Significant Change Form (or equivalent) should be completed and provided to the authorizing agency AO for review, approval, and signature The final completed/approved form should be uploaded to the CSP's MAX secure repository within the "Significant Changes" subdirectory under Continuous Monitoring Lastly, the CSP should send an email to info@fedramp gov notifying the FedRAMP PMO that a significant change form has been completed and is available for review within the secure repository. All significant changes should be assessed and validated by the 3PAO/independent assessor, as determined necessary by a Security Impact Analysis (SIA) The FedRAMP PMO performs periodic checks of FedRAMP Authorized packages for significant changes and may contact the CSP with follow-up questions or concerns

Charles Solomon-Jackson charles solomon-jackson@va gov vafedramppmo@va gov

Eric Beasley (b) (6) @mbltechnologies com
(b) (6) mbltechnologies com



Jennifer Carlson

FedRAMP PMO Support (Noblis)

FedRAMP | TTS | GSA

m (b) (6)
e: jennifer.carlson@gsa gov

John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
| william.hamilton@gsa gov

From: Ashley Kamauf <[6] (6) @a2la org>
Tα "laurie.southerton@qsa.qov" <[aurie.southerton@qsa.qov> CC: William Hamilton - QQC < john.hamilton@gsa.gov >, (b) (6) - QQC-C(b)(6) Subject: RE MBL Technologies Date: Thu. 9 Jun 2022 16:50 09 +0000 Message-ID: <SA0PR19MB4285FBF1E5418C0CD4D210D184A79@SA0PR19MB4285.namprd19 prod.outlook.com> X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0 X-Email-Hash-MD5: d9f92b3e34bf895e39b1db2062bf15b1

Hev Laurie

Apologies for the delay - we are still going through our peer evaluation this week.

Neither of the individuals noted below are currently being used to meet the certification requirements as I understand it. It looks like they are utilizing:

(CISSP CISA, CISM) (CISSP) (6) (6) (CISSP) (CISSP OSCP) Senior Assessor (b) (6) Junior Assessor. (b) (6) Pen Tester: (b) (6)

I am not sure why Eric and (a) (b) were the point people on this call as they should only be playing supporting roles without the appropriate certifications.

I apologize for not having any additional insight but please let me know if I need to follow up in any way.

Thanks

Ashley Kamauf
A2LA | Cybersecurity Program Manager
Direct: (5) (6) | akamauf@A2LA ora
My Hours: 8 00 am - 4:00 pm (ET)

A2LA Office Hours: 8:00 am - 8:00 pm (ET)

From: Laurie Southerton - QQC-C < laurie.southerton@gsa gov>

Sent: Monday, June 6, 2022 1:10 PM

To: Ashley Kamauf ([b]/(6]) a2la.org>
Cc: William Hamilton - QQC <john.hamilton@gsa.gov>; Evan Isaacs - QQC-C <evan.isaacs@gsa.gov>

Subject: MBL Technologies

Ashley,

My colleagues just got out of a meeting where MBL Technologies was the 3PAO, specifically Eric Beasley, (b) (6)

Assessor and Assessor but he has no certs (b) (6) is a Junior Assessor and has no certs.

It is reported to me that Eric, more so thar (b) (6) , was in over his head as the Assessor. He failed to answer most of the Review Team's questions.

Do you have any insight on these two folks?

Laurie

Laurie Southerton

FedRAMP PMO Support (Noblis)

FedRAMP | TTS | GSA

e: Laurie.Southerton@gsa gov

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Date: Fri. 10 Jun 2022 13:56:16 -0400
      Message-ID: <CAH6vP00grg9riVF+q4WSF8SBzavr9mNVq5kTHnSW_GJPBrH+7w@mail.gmail.com>
          Subject: Re MBL Technologies
            Tα (b) (6) - QQC-C (b) (6) @gsa.gov>
              Cc: John Hamilton <william.hamilton@gsa gov>, Ashley Kamauf       @a2la.org>, William Hamilton - QQC <john hamilton@gsa gov>
   X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 826ab0a6070bcd21a827b1fccc59b713
The draft is created I know Ashley does not have access to it but I included Ashley so she is tracking with us
The draft is located here: (b) (6)
I can add more if needed I figured this is a good start
On Fri, Jun 10, 2022 at 10:43 AM Evan Isaacs - QQC-C (b) (6) @gsa gov wrote:
 No problem Laurie - are you able to develop a draft and share it with me? I can review after
 On Thu, Jun 9, 2022 at 4:20 PM John Hamilton < william hamilton@gsa gov > wrote:
  Ashley - Thank you for checking into this for us
  @Laurie and UTE - Let's plan on sending a consultation remediation notice to MBL regarding this personnel issue Can you work together to draft an email; we need to meet with MBL to talk about this and have them develop an internal CAP following our convo
  Thanks all -
  John
  On Thu, Jun 9, 2022 at 3:27 PM Laurie Southerton - QQC-C < laurie southerton@gsa gov > wrote:
   That is too bad for MBL Technologies the only two folks in attendance for the meeting were
   Eric Beasley, Y
    The review meeting was very poorly orchestrated by these two representing the 3PAO Per the documentation provided for the CSO assessment both of these folks
    are the only two listed in the SAP and SAR:
       The members of the IA security testing team are found in Table 5-1 Security Testing Team.
                                Table 5-1 Security Testing Team
        Name Role
Eric Beasley 3PAO Manager
                                                 (b) (6) bit
    We now know why these folks (Beasley (b) (6)) were totally unprepared. This is unacceptable
    This is exactly the type of scenario with the 3PAOs that we are trying to eliminate
    Laurie
    On Thu, Jun 9, 2022 at 12:50 PM Ashley Kamauf (b) (6) a2la org wrote:
     Hev Laurie
     Apologies for the delay - we are still going through our peer evaluation this week.
     Neither of the individuals noted below are currently being used to meet the certification requirements as I understand it. It looks like they are utilizing:
     Senior Assessor(b) (6) (CISSP CISA. CISM)
     Junior Assessor: (b) (6) (CISSP)(b) (6)
     Pen Tester: (b) (6) (CISSP OSCP)
     I am not sure why Eric and b) (6) were the point people on this call as they should only be playing supporting roles without the appropriate
     certifications
     I apologize for not having any additional insight but please let me know if I need to follow up in any way.
```

Ashley Kamauf A2LA | Cybersecurity Program Manager My Hours: 8 00 am - 4:00 pm (ET) A2LA Office Hours: 8:00 am - 8:00 pm (ET) From: Laurie Southerton - QQC-C \leq <u>laurie southerton@gsa gov</u> \geq Sent: Monday, June 6, 2022 1:10 PM To: Ashley Kamauf < (b) (6) a2la org> Cc: William Hamilton - QQC < john hamilton@gsa gov >; b) (6) - QQC-C <(b) (6) @gsa gov > Subject: MBL Technologies Ashley, My colleagues just got out of a meeting where MBL Technologies was the 3PAO, specifically Eric Beasley, (b) (6) I see that Eric is in the db as both Senior Assessor and Assessor but he has no certs (b) (6) It is reported to me that Eric, more so than (5) (6), was in over his head as the Assessor He failed to answer most of the Review Team's questions Do you have any insight on these two folks? **Laurie Southerton** FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA e: Laurie.Southerton@gsa gov 5202 Presidents Court, Suite 220 Frederick, MD 21703 Main Line: 301 644 3248 www A2LA org f 💆 in Disclaimer: The information contained in this transmission is confidential and proprietary information intended only for the use of the individual or entity named above and is the property of A2LA If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and delete the original message Laurie Southerton FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA m: (b) (6) e: Laurie.Southerton@gsa gov



John Hamilton

FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA

[5] [6] | william hamilton@gsa.gov

```
Date: Fri. 10 Jun 2022 11:43:35 -0400
      Message-ID: <CAH6vP028nDpf9zvuP7nPRD+rjCgfMK-M8Z1uFC+nvEt84j+YkQ@mail.gmail.com>
         Subject: Re MBL Technologies
           Tα (b) (6) - QQC-C (b) (6) @gsa.gov>
              X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: d18e92969a862ca4bf2691673dddaf27
Evan
I will get to it and share the link
Laurie
On Fri, Jun 10, 2022 at 10:43 AM(b) (6) - QQC-C (b) (6) @gsa gov wrote:
Hi John
 No problem Laurie - are you able to develop a draft and share it with me? I can review after
 On Thu, Jun 9, 2022 at 4:20 PM John Hamilton < william hamilton@gsa gov > wrote:
  Ashley - Thank you for checking into this for us
  (@Laurie and Otto Let's plan on sending a consultation remediation notice to MBL regarding this personnel issue Can you work together to draft an email; we need to meet with MBL to talk about this and have them develop an internal CAP following our convo
  Thanks all -
  John
  On Thu, Jun 9, 2022 at 3:27 PM Laurie Southerton - QQC-C < laurie southerton@gsa gov > wrote:
    Ashley,
   That is too bad for MBL Technologies the only two folks in attendance for the meeting were
   (b) (6)
    The review meeting was very poorly orchestrated by these two representing the 3PAO Per the documentation provided for the CSO assessment both of these folks
   are the only two listed in the SAP and SAR:
       The members of the IA security testing team are found in Table 5-1 Security Testing Team
                              Table 5-1 Security Testing Team
               Name Role
3PAO Manager
    We now know why these folks (Beasley (b) (6)) were totally unprepared. This is unacceptable
   This is exactly the type of scenario with the 3PAOs that we are trying to eliminate
    Laurie
    On Thu, Jun 9, 2022 at 12:50 PM Ashley Kamauf (b) (6) a2la org> wrote:
     Apologies for the delay – we are still going through our peer evaluation this week.
    Neither of the individuals noted below are currently being used to meet the certification requirements as I understand it. It looks like they are utilizing:
     Senior Assessor (b) (6) ool (CISSP CISA, CISM)
     Junior Assessor: (b) (6) (CISSP) (b) (6)
     Pen Tester: (b) (6) (CISSP OSCP)
    I am not sure why Eric and [b] (6) were the point people on this call as they should only be playing supporting roles without the appropriate
    I apologize for not having any additional insight but please let me know if I need to follow up in any way.
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Ashley Kamauf

Thanks!

A2LA | Cybersecurity Program Manager

(b) (6) Direct: (b) (6) A2LA org My Hours: 8 00 am - 4:00 pm (ET) A2LA Office Hours: 8:00 am - 8:00 pm (ET) From: Laurie Southerton - QQC-C < laurie southerton@gsa gov > **Sent:** Monday, June 6, 2022 1:10 PM To: Ashley Kamauf < (b) (6) a2la org >
Cc: William Hamilton - QQC < john hamilton@gsa gov >; (b) (6) - QQC-C < (b) (6) @gsa gov > Subject: MBL Technologies Ashley, My colleagues just got out of a meeting where MBL Technologies was the 3PAO, specifically Eric Beasley, (b) (6) Senior Assessor and Assessor but he has no certs (b) (6) is a Junior Assessor and has no certs It is reported to me that Eric, more so than (b) (6), was in over his head as the Assessor He failed to answer most of the Review Team's questions Do you have any insight on these two folks? Laurie **Laurie Southerton** FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA m (b) (6) e: Laurie.Southerton@gsa gov 5202 Presidents Court, Suite 220 Frederick, MD 21703 Main Line: 301 644 3248 www A2LA org f 💆 in.



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Laurie Southerton FedRAMP PMO Support (Noblis) FedRAMP | TTS | GSA

m:(b) (6) e: Laurie.Southerton@gsa gov

FedRAMP Program Manager of Security Operations
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| william hamilton@gsa.gov



U.S. General Services Administration

Evan IsaacsTechnology Transformation Services
Program Management Office, FedRAMP